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EDEN-NRC-2026-002

May 5, 2026

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Reference: Eden Radioisotopes, LLC
Eden Isotope Production Complex
Project/Docket No.: 99902077

Subject: Submittal of the Construction Permit Application
for the Eden Isotope Production Complex

With this letter, Eden Radioisotopes, LLC (Eden) is applying to the U.S. Nuclear Regulatory Commission (NRC) to obtain a construction permit under 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities" for the Eden Isotope Production Complex (EIPC). Eden plans to construct and operate the EIPC near Eunice, Lea County, New Mexico.

The purpose of the EIPC is to produce urgently needed medical isotopes, which are in short supply around the globe and produced primarily in foreign countries. As a domestic medical isotope production facility, the EIPC will enhance both national security and public health. The facility consists of a small, non-power, open-pool reactor facility, a separation processing hot cell facility, a target fabrication facility, and a waste packaging, handling, and storage facility in addition to administrative and storage space. The intent to submit this application was described in the Eden Regulatory Engagement Plan dated June 30, 2025 (ML2518A768) and subsequent revision dated January 15, 2026 (ML26015A111).

Consistent with Revision 1 of the Regulatory Engagement Plan, Eden requests that the NRC schedule a 12-month review from completion of the acceptance review (docketing) to issuance of the Construction Permit.

Eden anticipates that other NRC approvals will be necessary for the operations phase of the EIPC project. These include licenses under 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material"; 10 CFR Part 40, "Domestic Licensing of Source Material"; and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material," to receive, possess, produce, use, and transfer, as applicable, special nuclear material, source material, and byproduct material, respectively. Corresponding applications will be provided in future submittals. For clarity, a separate application under 10 CFR Part 70 will be made in the future for the activities within the target fabrication area of the EIPC.

The enclosed application for a Part 50 construction permit follows the guidance in NUREG-1537, "Guidelines for Preparing and Reviewing Applications for the Licensing of Non-Power Reactors," and its corresponding Interim Staff Guidance augmentation for the licensing of radioisotope production facilities.

Enclosure 2 transmitted herewith contain sensitive unclassified non-safeguards information (SUNSI).
When separated from the SUNSI, this transmittal letter is decontrolled.

A Pre-Application Readiness Assessment of the Draft EIPC Environmental Report was conducted by the NRC over the period March 12-March 29, 2024, and the NRC issued its summary report to Eden via letter on May 1, 2024 (ML24115A130). Similarly, a Pre-Application Readiness Assessment of the Draft EIPC Preliminary Safety Analysis Report (PSAR) was conducted by the NRC over the period February 25-March 27, 2025, and the NRC issued its summary report to Eden via letter on May 15, 2025 (ML25115A140).

Consistent with common licensing practice, much of the PSAR is written in the present tense, including discussions of facilities and programs not yet built or developed. Exceptions to this approach are the discussions of operating experience and completed studies and evaluations, which are written in the past tense.

The application contains commercially sensitive, proprietary [PROP], and security related information [SRI], and, as such, Eden is requesting that this information be withheld from public disclosure in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Request for Withholding." Export control information [ECI] is also marked for withholding per 10 CFR Part 810, "Assistance to Foreign Atomic Energy Activities." Public and non-public versions of the portions of the application containing commercially sensitive, proprietary, and security related information are submitted as separate enclosures as described in the list of enclosures at the end of this letter. An affidavit accompanying this request is also included in the list of enclosures to this letter.

This application for a construction permit consists of the following enclosures:

Enclosure 1 provides the General Information required by 10 CFR 50.33(a)-(e), (h), and (j); 10 CFR 50.34(a)(9); and 10 CFR 50.55(a) to support submittal of an application for a construction permit.

Enclosure 2 provides a non-public version of the Preliminary Safety Analysis Report (PSAR), provided in accordance with 10 CFR 50.34(a), including the Environmental Report (PSAR Chapter 19) required by 10 CFR 50.30(f). This enclosure contains proprietary information, a subset of which has been determined to be export control information, as well as security related information. Eden requests that the NRC withhold Enclosure 2 from public disclosure under 10 CFR 2.390.

Enclosure 3 provides a public version of the PSAR, including the Environmental Report (PSAR Chapter 19).

Enclosure 4 provides a request for specific exemption from 10 CFR 50.33(f)(1) and 10 CFR 50 Appendix C – Financial Qualifications.

Enclosure 5 provides Eden's plans to submit additional confirmatory site-specific information to support the site geotechnical and seismological characteristics and associated data collection, testing, analyses, and modeling that are described in PSAR Section 2.5.

Enclosure 6 provides the Eden Quality Assurance Program Description (QAPD), in accordance with 10 CFR 50.34(a)(7).

Enclosure 7 provides an affidavit supporting the proprietary treatment of the Eden proprietary information contained in Enclosure 2, pursuant to 10 CFR 2.390.

Enclosure 8 provides Eden's request for confirmation of eligibility for reduced hourly rate.

In accordance with 10 CFR 50.30(e) and 10 CFR 170, Eden understands there is a filing fee and that fees for construction permit reviews are based on the full costs of the review. Eden requests these fees be invoiced for payment.

If you have any questions, please feel free to contact me or Mr. James Saldarini, Eden Licensing Director, at 240-344-5204 (jsaldarini@edenrad.com).

I declare under penalty of perjury that the foregoing is true and correct.
Executed on May 5, 2026.

Chris Wagner

Chris Wagner
Chief Operating Officer
Eden Radioisotopes, LLC

Enclosures:

- 1) General Information (Non-proprietary)
- 2) Preliminary Safety Analysis Report (Proprietary)
- 3) Preliminary Safety Analysis Report (Non-proprietary)
- 4) Request for Specific Exemption – Financial Qualifications (Non-proprietary)
- 5) Supplemental Information (Non-proprietary)
- 6) Quality Assurance Program Description (Non-proprietary)
- 7) Affidavit Supporting Request for Withholding from Public Disclosure (10 CFR 2.390)
- 8) Request for Confirmation of Eligibility for Reduced Hourly Rate (Non-proprietary)

cc: (w/o enclosures)

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New Reactor Licensing Branch
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